

TAPTALK H₂O!

Division of Public Health • Fall 2012

Tapping Into Good Health

The Ground Water Rule – Sanitary Survey

by Kevin Cottman

When the federal *Ground Water Rule* came into effect in December 2009, not only did it change how total coliform repeat sampling was conducted, but it also changed how sanitary surveys were performed. When the rule took effect, the states had to divide the survey up into eight categories. In each of the categories the states had to choose at least one significant deficiency. The eight categories are: Source, Treatment, Distribution System, Finish Water Storage, Pumps, Monitoring and Reporting, System Management and Operation, and Operator Compliance with State Requirements.

By protecting the source, we are preventing contaminants and pathogens from reaching the consumer. The following items will be checked when performing a survey: well construction, potential sources of contamination, setback distance, source quantity and capacity, well locations, source water transmission mains, site security, and general housekeeping.

Treatment will vary from system to system, based on the quality of the ground water. During a survey, a review of the design criteria, plant records, and past inspection will be performed. The main focus of the survey will be on the overall design, operation, maintenance, and management of the treatment facility.

Distribution system maintenance is very important for a water system because a break in a water main can compromise the safety of the drinking water. When performing a sanitary survey the state will review schematics, operations and maintenance records, operating procedures, construction standards, and distribution system water quality data.

Finished water storage can not only affect

your water quality, but it also can play a huge factor on your water quantity. It is very important that you maintain your finish water storage properly to make sure you have enough storage for emergency. When the state comes out to do a survey, it will review files on the tank, perform field inspections, operational readiness, site security, and potential sanitary risks. The state will also review procedures with the water system and discuss current operations and maintenance schedules.

When performing an inspection on the pumps, the state will be checking all the pumps that are used and visible for inspection. This would be any chemical, booster, or even turbine pumps that you may have. The state will be looking at the condition of the pumps, seeing if you are using the required oil (if required then must use food grade oil), if you have back up pumps, and if they are the right size for the system.

An important part of maintaining a proper water system is the monitoring, reporting and data verification. State inspectors will be reviewing your monthly reports and daily logs. They will also make sure you are keeping the proper past files like results, previous sanitary surveys, and public notices. The state will check if you have standard operating procedures or emergency plans.

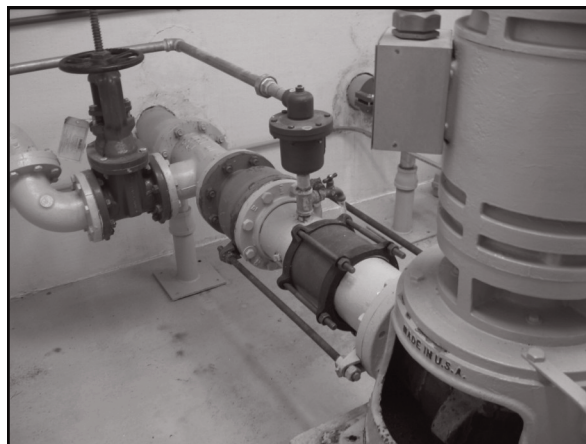
Behind every good system is a system that has

proper management and operations. State inspectors will review the system's goals, plans, and budget to determine if they need some assistance. The state will also review the system to see if it has enough staff and funding to properly run the system safely.

The last thing the state will evaluate is the operators. The state will confirm that the operator is licensed and that he/she has all the proper endorsements. Only a trained operator with the proper endorsements may operate a public water system.

- If the state finds a significant deficiency during the survey, a letter listing the significant deficiencies will be mailed.
- Once you receive the sanitary survey letter you must respond to the state within 30 days with a letter stating that the deficiencies have been corrected or submit a corrective action plan.

-continued on page 2.



A turbine pump (right) and associated piping.



DELAWARE HEALTH AND SOCIAL SERVICES
Division of Public Health
Office of Drinking Water

**Don't miss the Administrator's
Corner on page 2.**

The Administrator's Corner



By Ed Hallock

Program Administrator
Office of Drinking Water

We're back! Well, we have the pleasure to announce that the new and improved Tap Talk newsletter is back into production. I am excited to have our new

editor on board, Keith Harrison, trainer/educator. Keith comes to us from Vermont with a great background in environmental science and nature education. Laurie Poore, Lead/Copper Rule manager, is a new addition to the ODW staff. Some of you may have spoken to Laurie about your lead/copper sampling. She has been working to ensure everyone is aware of the monitoring requirements of this complex rule. I am impressed with her ability to work with our water systems and make sure they also understand the rule.

There have been some organizational changes since our last newsletter. A big change is the move of the Drinking Water State Revolving Fund (DWSRF) program to the Jesse Cooper Building. Read more about this change on page 3 of this newsletter.

This year we adopted four new EPA regulations: The Long Term 2 Enhanced Surface Water Treatment Rule (LT2); the Stage 2 Disinfectant/Disinfection Byproducts Rule (Stage 2); the Ground Water Rule (GWR); and, the Lead/Copper Rule Short Term Revisions (LCR STR). We have submitted these rules to the EPA in order to gain primacy for them. Primacy means that we will have the primary enforcement responsibility here in Delaware.

I invite all our readers to send us suggestions on items they would like to read about in this newsletter. It is our goal to make this newsletter a useful tool to our readers, so please let us know how we're doing. You can email your comments and/or suggestions to:

Edward.Hallock@state.de.us or
Keith.Harrison@state.de.us.

The Groundwater Rule *(cont. from pg. 1)*

- Within 120 days of receiving the deficiency letter, the system must have the deficiencies corrected or be in compliance with the corrective action plan. Once you have completed the repairs you must notify the state within 30 days of completion.
- When the state receives your corrective action notice, the state must perform an inspection within 30 days to verify that the deficiencies have been corrected.

- If a deficiency is not corrected or in compliance with your corrective action plan in 120 days or if the corrective action is not received in 30 days, a Ground Water Rule violation will be issued and a public notification will be required.

- All the information provided to you in this article came from EPA's Ground Water Rule Fact Sheet: Sanitary Surveys. If you like to find out more about the groundwater rules, contact the Office of Drinking Water or visit: <http://www.epa.gov/safewater>.

New Reporting Requirement for Lead and Copper Rule

by Laurie Poore

The Office of Drinking Water (ODW) is introducing the Lead Consumer Notice, a new mandatory requirement under the Lead and Copper Rule.

In order to maintain compliance under the Lead and Copper Rule, the EPA is now requiring all community and non-transient non-community water systems to notify occupants of lead tap water results after sample results are received. Awareness is the primary goal of this reporting requirement, as the Lead Consumer Notice is used to inform persons served from each sample site location and is to be issued regardless of whether the EPA action level of 15 ppb has been exceeded. Therefore, within thirty days of receiving the lab analysis, a Lead Consumer Notice must be mailed or hand-delivered to all sample site locations where a lead tap water sample was collected during each monitoring period.

For non-transient non-community water systems, it is also acceptable to post the lead consumer notice with the sample site locations and corresponding lead level results in a common area for all staff and occupants to review. In addition, each Lead Consumer Notice is also required to provide information on the health effects of lead, steps to reduce exposure to lead in drinking water, and contact information for your water system. Once the lead consumer notice has been distributed, a delivery certification form must be returned to ODW within ten days, along with a copy of the information that was provided to the occupants, for our records.

For more information on the Lead Consumer Notice requirement, or to receive your lead consumer notice template and delivery certification form electronically, please contact Laurie Poore, Lead and Copper Rule manager, at: laurie.poore@state.de.us.

The Drinking Water State Revolving Fund

The Drinking Water State Revolving Fund (DWSRF) works closely with ODW to support public water systems and water system personnel in capitalization project planning and performance as well as educational opportunities about one of our most precious natural resources, water.

Heather Warren is the DWSRF administrator with Rebecca Fahey, Don Henry, Carla Coffman, Jacquelyn Park, and Karen Trimmer as the full DWSRF staff. Since March 2011, DWSRF has been located in the Jesse Cooper Bldg. at 417 Federal Street in Dover. The program participates in state-wide conferences, host borrower's conferences and are actively engaged in opportunities to educate, communicate, and participate in community events geared to protect the health of all Delaware's residents.

For more information visit: <http://dhss.delaware.gov/dhss/dph/hsp/dwsrf.html>.



Contrast of old and new at the Wilmington Water Treatment Plant.

Fluoride in Public Water Systems

Fluoride is a naturally occurring mineral found in many of Delaware's public water systems. Many systems add fluoride, while other systems contain optimal levels naturally. Research has shown that fluoride in drinking water prevents tooth decay, and the Centers for Disease Control and Prevention (CDC) recommends that drinking water contain fluoride. The optimal level for fluoride in Delaware is 0.8-1.2 ppm. Currently, 43 public water systems contain optimal levels of fluoride, representing 86% of Delaware's population. Of those 43 systems, 12 contain fluoride naturally and the remaining systems add fluoride to achieve optimal levels. For more information on fluoride in Delaware's public water systems, visit: http://dhss.delaware.gov/dhss/dph/hsp/files/flouride_flyer.pdf.

Consumer Confidence Reports

by Keith Harrison

As of this writing, 206 of 216 public water systems have submitted their required Consumer Confidence Reports (CCRs) for the 2011 calendar year. The Office of Drinking Water (ODW) understands the challenges faced when writing a CCR.

In April 2010, the EPA published: *Preparing Your Drinking Water Consumer Confidence Report, Guidance for Water Suppliers*. It is available online at: http://www.epa.gov/ogwdw/ccr/pdfs/guide_ccr_forwatersuppliers.pdf or at ODW.

The EPA manual breaks down the CCR requirements into eight sections that are complete with explanations and examples. Earlier this year, ODW staff created a checklist for CCR compliance based on the EPA manual. To help water system personnel when creating their CCRs, ODW is planning two CCR trainings in the Spring of 2013 (Feb. 20 & March 21, 2013). If you would like to request a copy of the ODW checklist, contact Keith Harrison at: Keith.Harrison@state.de.us.

Consumer Confidence Report Helpful Tips

Only report data from the previous five years. The 2012 CCR should contain data from 2008-2012.

If a source water assessment has been performed on your water system, you are required to present a summary of that information in your CCR.

If your water system serves less than 500 people, you may be covered by the mailing waiver that was written into the Delaware Drinking Water Regulations. The mailing waiver may also apply to systems serving less than 10,000 people, however, certain conditions exist.

Contact Keith Harrison at:
Keith.Harrison@state.de.us.

Reminders

- DWSRF pre-applications were due on September 30, 2012. Contact Heather Warren for more information (302-744-4739).
- Do your water system's wells have source water taps? If not, please install one in each well. Source water taps are required for all public water systems in Delaware.
- Notice to all systems on standard 6-month lead and copper monitoring: lead and copper samples, along with WQPs if required, are to be collected by December 31, 2012. All sample results shall be submitted to ODW no later than January 10, 2013.
- Email addresses: We are putting together an email list to be used for notifying operators and water systems for trainings. To be added to the list, send an email to Keith Harrison at: Keith.Harrison@state.de.us.

Approved Sampler/Tester Training

We are once again holding the AST Basic and Refresher trainings on a regular basis. Trainings will be held in the ODW facility at 43 S. DuPont Hwy in the Edgehill Shopping Center, Dover. We will be glad to hold a training class at your facility if you have at least 6 people. For more information on this training contact, Keith Harrison at: Keith.Harrison@state.de.us.

Scheduled AST Trainings

AST Basic:

October 11, 2012
November 15, 2012
January 10, 2013
February 14, 2013
March 14, 2013
April 11, 2013
May 9, 2013
June 13, 2013

AST Refresher:

October 25, 2012
November 29, 2012
January 24, 2013
February 28, 2013
March 28, 2013
April 25, 2013
May 23, 2013
June 27, 2013

Office of Drinking Water
43 South DuPont Hwy
Dover, Delaware 19901